

EXHIBIT B



Claim Form

IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
COMMERCIAL COURT
ROYAL COURTS OF JUSTICE

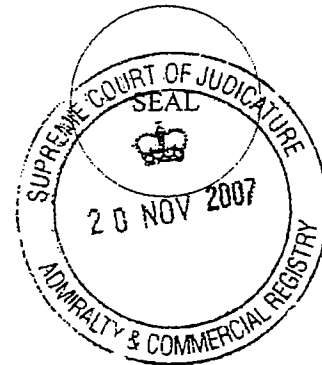
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|------------|---------------------------|
| | <i>for court use only</i> |
| Claim No. | 2007-1566 |
| Issue Date | 20-11-07 |

Claimant(s)

(1) Cavell USA Inc
2 Central Square
Cambridge MA 02139-311
United States of America

(2) Ken Randall

Shepherd Cottage
60 The Heath
East Malling
Kent
ME19 6JL



Defendant(s)

(1) Seaton Insurance Company

200 Metro Center Blvd
Suite 8
Warwick
RI 02886
USA

(2) Stonewall Insurance Company

200 Metro Center Blvd
Suite 8
Warwick
RI 02886
USA

Name and address of Defendant receiving this claim form

see addresses above

| | |
|-------------------|----------------|
| Amount claimed | To be assessed |
| Court fee | £1,930.00 |
| Solicitor's costs | To be assessed |
| Total amount | To be assessed |

Claim No.

Berwin Leighton Paisner LLP
Adelaide House
London Bridge
London
EC4R 9HA

DX 92 London

T: 020 7760 1000

F: 020 7760 1111

Ref: JJS/DJM/22137/12

Claimant's or solicitor's address to which
documents or payments should be sent if
different from overleaf including (if appropriate)
details of DX, fax or e-mail.

Claim No. Does, or will, your claim include any issues under the Human Rights Act 1998? ☐ Yes ☒ No

Brief details of claim

The Claimants' claim is for:

- (1) A declaration that all of the claims advanced by the Defendants in the Complaint which has been filed by them in the US District Court for the Southern District of New York and is attached hereto marked "Annex 1" ("the Complaint"), have been fully compromised and/or released pursuant to clause 13 of the Term Sheet, which was agreed between the parties in February 2006 and is attached hereto marked "Annex 2" ("the Term Sheet");
- (2) A declaration that, by virtue of clause 13 of the Term Sheet, alternatively in any event, the Claimants have no liability to the Defendants in respect of the claims contained the Complaint.
- (3) Damages for breaching the Term Sheet by:
 - (a) The Defendants causing two US Arbitration Panels hearing disputes between them and National Indemnity Company to issue a series of document and deposition subpoenas against the Claimants, culminating in subpoenas dated 19 February 2007 ("the subpoenas"); and
 - (b) The First Defendant filing a motion for injunctive relief with the US District Court for the District of Connecticut and obtaining an order partially enforcing the Claimants' compliance with the subpoenas;
 - (c) The Defendants bringing the Complaint against the Claimants.
- (4) Interest thereon pursuant to section 35A of the Supreme Court Act 1981
- (5) Further or other relief.
- (6) Costs.

Particulars of claim ~~XXXXXX~~ (will follow if an acknowledgment of service is filed that indicates an intention to defend the claim)

Statement of Truth

~~XXXXXX~~ (The Claimant believes) that the facts stated in this claim form ~~XXXXXX~~ are true.

*I am duly authorised by the claimant to sign this statement

Full name Jonathan Jacob Sacher

Name of *(claimant) (solicitor's firm)

Berwin Leighton Paisner LLPsigned position or office held Partner

*(Claimant) (solicitor)

(if signing on behalf of firm, company or corporation)

*delete as appropriate

IN THE HIGH COURT OF JUSTICE

QUEEN'S BENCH DIVISION

COMMERCIAL COURT

BETWEEN:

Claim No. 2007 Folio 1566

(1) CAVELL USA INC

(2) KENNETH EDWARD RANDALL

Claimants

- and -

(1) SEATON INSURANCE COMPANY

(2) STONEWALL INSURANCE COMPANY

Defendants

ANNEXES TO THE CLAIM FORM
